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July 15, 2025

VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Diane Ayerdi v. Zeta Global Holdings Corp., et al.*, No. 1:25-cv-05780-PAE

Dear Judge Engelmayer:

Please accept this as a letter motion which is being submitted in accordance with your Honor's Individual Rules and Practices in Civil Cases, Sec. 4(B)(2), as well as the ECF Rules and Instructions, Secs. 6.1 and 21.7, requesting that Your Honor enter an Order authorizing the formal sealing of the Complaint and Exhibit A to the Complaint at ECF Nos. 1 and 1-1.

On July 14, 2025, Plaintiff Diane Ayerdi filed her Complaint in this matter. ECF No. 1. Plaintiff respectfully requests that the Court seal the Complaint and Exhibit A to the Complaint, and replace the publicly available version with the properly redacted version submitted herewith in order to correct redaction errors in the original Complaint and protect certain of Plaintiff's personal information from inadvertent disclosure.

Counsel for Plaintiff is concurrently filing a Corrected Complaint and Exhibit A that assigns proper redactions to Plaintiff's personal information and makes no other changes.

Sincerely,

A handwritten signature in blue ink, appearing to read "GEM", is placed above the typed name of Gary E. Mason.

Gary E. Mason
MASON LLP

GRANTED. The Complaint and Exhibit A, filed at Dockets 1 and 1-1, respectively, shall be placed permanently under seal.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Paul A. Engelmayer", is placed above the typed name and title of Paul A. Engelmayer.

PAUL A. ENGELMAYER
United States District Judge

July 18, 2025
New York, New York